

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**LAUREN ROUNTREE, CONNER CAYSON,
MALLORY THAGGARD, and JULIE
MELILLO, on behalf of themselves and all
others similarly situated,**

No. 14 Civ. 2020 (RWS)

Plaintiffs,

-against-

INSIGHT GLOBAL, INC.,

Defendant.

STIPULATION OF DISMISSAL WITH PREJUDICE

WHEREAS, on March 21, 2014, Plaintiffs Lauren Rountree, Connor Cayson, Mallory Thaggard, and Julie Melilo (“Plaintiffs”) commenced the above-captioned lawsuit against Defendant Insight Global (“Defendant”), *see* ECF No. 2 (Complaint); and

WHEREAS, the Complaint alleges that Defendant violated the Fair Labor Standards Act (“FLSA”) and state labor laws by misclassifying Plaintiffs as exempt from the overtime protections of federal and state law, and denying Plaintiffs overtime for hours worked over 40 in a workweek; and

WHEREAS, Defendant denied Plaintiffs’ allegations and disputed that its classification of Plaintiffs as exempt was improper, or that Plaintiffs are owed overtime compensation or liquidated damages, *see* ECF No. 11 (Answer); and

WHEREAS, the parties engaged in settlement discussions with the assistance of a private mediator, and agreed to resolve Plaintiffs’ claims through a negotiated settlement, as outlined in the parties’ Settlement Agreement and General Release;

NOW, THEREFORE, it is hereby STIPULATED AND AGREED, by and between counsel for Plaintiffs and Defendant, and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and the parties' Settlement Agreement and General Release, that (1) the Settlement Agreement and General Release, including the release of all claims, should be approved; and (2) Plaintiffs' claims, which were the subject of a *bona fide* dispute, are hereby dismissed with prejudice.

Dated: January 2, 2015
New York, New York

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SO ORDERED:

Dated: _____, 2015

The Honorable Robert W. Sweet
United States District